

BellSouth Telecommunications, Inc. Legal Department 1600 Williams Street Suite 5200 Columbia, SC 29201 Patrick W. Turner
General Counsel-South Carolina

803 401 2900 Fax 803 254 1731

patrick.turner@bellsouth.com

June 14, 2007

The Honorable Charles Terreni Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Re: Petition of Global Connection of South Carolina, Inc. for the

Designation as an Eligible Telecommunications Carrier

Docket No.: 2007-172-C

Dear Mr. Terreni:

Enclosed for filing are an original and one (1) copy of AT&T's Petition to Intervene Out of Time in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this response as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/sgm Enclosure

cc: All Parties of Record

DM5 #681514

THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2007-172-C

IN RE:)	
Petition of Global Connections of South Carolina, Inc. for Designation as Eligible Telecommunications Carrier)))	PETITION TO INTERVENE OUT OF TIME

Pursuant to S. C. Code Regs. 103-825, BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully requests the Public Service Commission of South Carolina ("the Commission") for permission to intervene out of time as a party of record in the above-captioned proceeding. In support of this request, AT&T South Carolina respectfully submits that:

- 1. AT&T South Carolina is a telephone utility presently providing telecommunications services to its subscribers pursuant to intrastate tariffs approved by the Commission.
- 2. The authorized representative for AT&T South Carolina in this proceeding is:

Patrick W. Turner 1600 Williams Street, Suite 5200 Columbia, South Carolina 29201 Email: pt1285@att.com Telephone: (803) 401-2900 Facsimile: (803) 254-1731

- 3. AT&T South Carolina has an interest in this proceeding because Global Connections of South Carolina, Inc.'s ("Global Connections") request for ETC designation is, on its face, deficient and inconsistent with the Commission's decisions in the rulemaking proceedings addressing various matters related to eligible telecommunications carrier ("ETC") designations. For example, although Global Connections' Petition states that Exhibit E is a list of exchanges for which it seeks ETC designation from the Commission, *see* Petition at ¶12, that exhibit appears to be a list of exchanges in the States of Alabama, Tennessee, and Georgia. Additionally, although the Commission has decided that it will "consider the FCC's guidelines regarding designation of new ETC's," *see* Commission Directive in Docket No. 2006-37-C (May 30, 2007), Global Connections' Petition provides little or no information that would assist the Commission in considering those FCC guidelines.
- 4. As a result of the recent merger of AT&T Inc. and BellSouth Corporation, deciding whether to intervene in this docket required coordination and discussion within the newly merged company. AT&T South Carolina did not reach a decision prior to the June 8, 2007 deadline established by the Commission.
- 5. The current schedule in this docket requires all parties to prefile direct testimony on June 29, 2007, and to prefile responsive testimony on July 18, 2007. AT&T South Carolina respectfully submits that granting its Petition out of time will not delay this proceeding or prejudice any party to this proceeding. AT&T South Carolina, therefore, respectfully requests that the Commission grant its Petition and allow it to intervene as a party of record.
- 6. AT&T reserves its right to testify and present evidence at any hearing in this proceeding. At this time, AT&T does not know how much time would be required for such presentation.

WHEREFORE, based on the foregoing, AT&T South Carolina requests the following relief:

- 1. that it be allowed to intervene as a formal party of record in this proceeding by this Commission's granting this Petition to Intervene;
- 2. that any parties of record be directed to provide AT&T South Carolina with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding; and
 - that the Commission grant such other relief as it deems just and proper.
 Respectfully submitted on this 14th day of June, 2007.

Patrick W. Turner

1600 Williams Street, Suite 5200 Columbia, South Carolina 29201

(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

681491

STATE OF SOUTH CAROLINA)	
)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)	

The undersigned, Jeanette B. Mattison, hereby certifies that she is employed by the Legal Department for AT&T South Carolina ("AT&T") and that she has caused AT&T's Petition to Intervene Out of Time in Docket No. 2007-172-C to be served upon the following this June 14, 2007:

C. Lessie Hammonds, Esquire Nanette S. Edwards, Esquire Office of Regulatory Staff Post Office Box 11263 Columbia, South Carolina 29211 (U. S. Mail and Electronic Mail)

F. David Butler, Esquire Senior Counsel S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (U. S. Mail and Electronic Mail)

Jocelyn G. Boyd, Esquire Staff Attorney S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (U. S. Mail and Electronic Mail)

Joseph Melchers Chief Counsel S.C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (U.S. Mail and Electronic Mail) Margaret M. Fox, Esquire McNair Law Firm, P. A. P. O. Box 11390 Columbia, South Carolina 29211 (SCTC) (U.S. Mail and Electronic Mail)

Houssam Abdallah Global Connection of SC, Inc. 3957 Pleasantdale Road Atlanta, Georgia 30340 (Global Connection of SC, Inc.) (U.S. Mail and Electronic Mail)

Scott Elliott, Esquire
Elliott & Elliott, P. A.
721 Olive Street
Columbia, South Carolina 29205
(United Telephone Co. of the Carolinas
d/b/a Embarq)
(U.S. Mail and Electronic Mail)

Jeanette B. Mattison

DM5 #681026